



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 10, 2019

By Email and ECF

Anthony Ricco
20 Vesey Street, Suite 400
New York, New York 10007

Re: United States v. Donville Inniss
Criminal Docket No. 18-134 (S-2)(KAM)

Dear Mr. Ricco:

Pursuant to 18 U.S.C. § 3505, please be advised by this letter that the United States intends to offer at trial foreign records of regularly conducted business activities obtained from Barbados and Bermuda via voluntary production by the Insurance Corporation of Barbados Ltd. and Mutual Legal Assistance Treaty requests. These records have been provided to you and identified through our various discovery productions. As you know we have previously made you aware in our discovery cover letters of the government's intention to introduce all evidence provided to you, including the foreign evidence described above, but we are highlighting these foreign records for your convenience. We also may receive supplemental records from such sources, and also would intend to offer those records at trial, as well.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

ROBERT A. ZINK
Chief, Fraud Section
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U.S. Department of Justice

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cc: Clerk of the Court (KAM) (by ECF)